

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

MICHAEL B. KINGSLEY,

Plaintiff,

vs.

Case No. 10-CV-832

STAN HENDRICKSON and FRITZ DEGNER,

Defendants.

PROPOSED JURY INSTRUCTIONS OF DEFENDANTS

Pursuant to the Order entered by the Court on October 23, 2015, defendants, Stan Hendrickson and Fritz Degner, respectfully request that the Court instruct the jury using the same instructions used by the Hon. Barbara B. Crabb at the first trial of this action (Docket Nos. 145 & 146), except as follows:

1. Defendants request that the Court add an additional instruction consistent with Civil § 7.01 of the Seventh Circuit Pattern Jury Instructions as reflected in Exhibit A hereto.

2. Defendants request that the Court substitute the instructions reflected in Exhibits B and C hereto for all but the last three paragraphs of the “Special Verdict Questions” instruction (Docket No. 146 at 3-4).

3. Defendants request that the Court omit the last paragraph (regarding nominal damages) from the Compensatory Damages instruction (Docket No. 146 at 5).

Defendants request these jury instructions without waiving their right to amend, supplement, or withdraw all or any portion of the instructions as the evidence and the Court's rulings at trial may dictate.

Dated this 19th day of January, 2016.

s/ Andrew A. Jones

Andrew A. Jones

Timothy H. Posnanski

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